

United States District Court
Eastern District of North Carolina
Western Division

FILED
CHARLOTTE, NC

MAY 14 2024

Case No. 5:24-cv-122
(To be filled out by Clerk's Office only)

US DISTRICT COURT
WESTERN DISTRICT OF NC

Jason Myers White

Inmate Number 22960

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

Iredell County
Vincent Pandolpha
Bert Connelly

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section IV. Do not include addresses here.)

COMPLAINT

(Pro Se Prisoner)

Jury Demand?

☐ Yes

☐ No

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

I. COMPLAINT

Indicate below the federal legal basis for your claim, if known. This form is designed primarily for pro se prisoners challenging the constitutionality of their conditions of confinement, claims which are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)
- ☐ Action under Federal Tort Claims Act (United States is the proper defendant; must have presented claim in writing to the appropriate Federal agency and received a notice of final denial of the claim pursuant to 28 U.S.C. § 2401(b))

II. PLAINTIFF INFORMATION

Name Jason Myers White

Prisoner ID # 22960

Place of Detention Iredell County Jail

Institutional Address P.O. Box 287

City Statesville State NC Zip Code 28687

III. PRISONER STATUS

Indicate whether you are a prisoner or other confined person as follows:

- ☒ Pretrial detainee ☐ State ☐ Federal
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☐ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

IV. DEFENDANT(S) INFORMATION

Please list the following information for each defendant. If the correct information is not provided, it could result in the delay or prevention of service. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1:

Iredell County
Name

Current Job Title

Current Work Address

Statesville NC 28687
City State Zip Code

Capacity in which being sued: ☐ Individual ☒ Official ☐ Both

Defendant 2:

Vincent Pandolpha
Name

Unknown
Current Job Title

Unknown
Current Work Address

Unknown
City State Zip Code

Capacity in which being sued: ☒ Individual ☐ Official ☐ Both

Defendant(s) Continued

Defendant 3:

Name

Bert Connelly

Current Job Title

Chief of Jail: Iredeell County

Current Work Address

P.O. Box 287

City

Statesville

State

NC

Zip Code

28687

Capacity in which being sued: ☒ Individual ☐ Official ☐ Both

Defendant 4:

Name

Current Job Title

Current Work Address

City

State

Zip Code

Capacity in which being sued: ☐ Individual ☐ Official ☐ Both

V. STATEMENT OF CLAIM

Place(s) of occurrence: Block G, Cell #1

Date(s) of occurrence: Feb 11th 2023

State which of your federal constitutional or federal statutory rights have been violated:

North Carolina

State here briefly the *FACTS* that support your case. Describe how each defendant was personally involved in the alleged wrongful actions, state whether you were physically injured as a result of those actions, and if so, state your injury and what medical attention was provided to you.

FACTS:

Who
did what to
you?

On Feb 11th 2023 I asked Correctional
Officer Vincent Pandolph for paper to
write the D.A. explaining my 100%o
Innocence. He popped my door & went
Insane & Beat me. Over 10 punches/slaps,
tried to break my Elbow, & split my
forehead on a Metal Beam. All
causing Hospitalization & stitches.
All on HD Camera in G-Block with witnesses,

What
happened
to you?

I was beaten for asking for
paper to write my innocence to the D.A.
I was also hospitalized & denied
my involvement in his prosecution

When did it
happen to
you?

February 11th 2023

Where did it
happen to
you?

Block G ; Cell #1

In Fredall County Jail

What was
your
injury?

Split Forehead, Sprained Elbow
Stitches, Bruising & Soreness.

- Ongoing Stress
- Loss of Access to Courts by
the Bert Connelly led Coverup of
this Ordeal.

VI. ADMINISTRATIVE PROCEDURES

WARNING: Prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions. 42 U.S.C. § 1997e(a). Your case may be dismissed if you have not exhausted your administrative remedies.

Have you filed a grievance concerning the facts relating to this complaint? ☒ Yes ☐ No

If no, explain why not:

Is the grievance process completed? ☒ Yes ☐ No

If no, explain why not:

VII. RELIEF

State briefly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

• Appoint me a lawyer to represent me
in what I feel is a very cut & dry
Lawsuit. Pandolpha was Fired immediately
• Allow me my day in court for Justice


IX. PLAINTIFF'S DECLARATION AND WARNING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint and provide prison identification number and prison address.

5-8-2024
Dated


Plaintiff's Signature

Jason Myers White
Printed Name

22960
Prison Identification #

P.O. Box 287 Statesville NC 28687
Prison Address City State Zip Code